

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

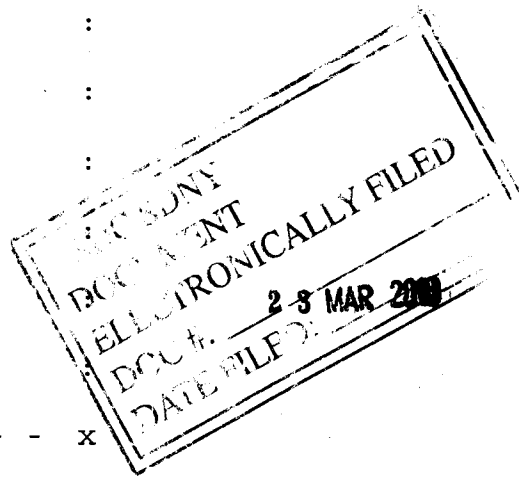
INDICTMENT

- v. -

WILCH DEWALT,
a/k/a "Sharrieff Sabazz Muhammad,"
a/k/a "G,"
a/k/a "Mark Fowler,"
a/k/a "License Man,"
ROBIN JONES-WOODSON,
GLENDIA HINTON,
JOSE R. TORRES-MUNOZ,
a/k/a "Paul,"
a/k/a "Roberto,"
a/k/a "Alberto,"
SARA DEL ROCIO CHERREZ-ROMERO,
a/k/a "Olga Nieves Matos,"
MAX LNU,
a/k/a "David Ray Craven,"
a/k/a "Julius Simons," and
DOUGLAS L. ROPER,
a/k/a "Nicky Roper,"
a/k/a "Nicky Martinez,"
a/k/a "Nick,"
a/k/a "Nate,"

Defendants.

10 CRIM 255



COUNT ONE

(Conspiracy To Commit Identity Fraud)

The Grand Jury charges:

The Identity Fraud Scheme

1. From in or about 2006 through in or about February 2010, WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/a "Mark Fowler," a/k/a "License Man," the defendant, was the ringleader of an organized scheme to procure real New York state

driver's licenses, learner's permits and identification cards issued by the Department of Motor Vehicles (collectively, "DMV Identification Documents") using stolen identities that belong to real people. In exchange for a fee of approximately \$7,000, and with the assistance of his co-conspirators, DEWALT typically supplied his customers with a complete "package" of fraudulent identification documents that they could use to submit an application to the DMV in a stolen identity. Those documents usually included a birth certificate, Social Security card, employee identification card, pay stub, W-2, and bank card, all of which bore the personal information of the stolen identity. The participants in this scheme also included, among others, two corrupt employees of the DMV: ROBIN JONES-WOODSON, the defendant, who helped process the fraudulent DMV applications, and GLENDA HINTON, the defendant, who used a non-public DMV database to provide information to DEWALT, including whether the DMV had previously issued DMV Identification Documents in the stolen identities.

Statutory Allegation

2. From in or about 2006, through in or about February 2010, in the Southern District of New York and elsewhere, WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/a "Mark Fowler," a/k/a "License Man," ROBIN JONES-WOODSON, GLENDA HINTON, JOSE R. TORRES-MUNOZ, a/k/a "Paul," a/k/a

"Roberto," a/k/a "Alberto," SARA DEL ROCIO CHERREZ-ROMERO, a/k/a "Olga Nieves Matos," MAX LNU, a/k/a "David Ray Craven," a/k/a "Julius Simons," and DOUGLAS L. ROPER, a/k/a "Nicky Roper," a/k/a "Nicky Martinez," a/k/a "Nick," a/k/a "Nate," the defendants, and others known and unknown, unlawfully, wilfully, and knowingly combined, conspired, confederated, and agreed together and with each other to violate Section 1028(a)(1) of Title 18, United States Code.

3. It was a part and an object of the conspiracy that WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/a "Mark Fowler," a/k/a "License Man," ROBIN JONES-WOODSON, GLENDA HINTON, JOSE R. TORRES-MUNOZ, a/k/a "Paul," a/k/a "Roberto," a/k/a "Alberto," SARA DEL ROCIO CHERREZ-ROMERO, a/k/a "Olga Nieves Matos," MAX LNU, a/k/a "David Ray Craven," a/k/a "Julius Simons," and DOUGLAS L. ROPER, a/k/a "Nicky Roper," a/k/a "Nicky Martinez," a/k/a "Nick," a/k/a "Nate," the defendants, and others known and unknown, unlawfully, wilfully, and knowingly, and without lawful authority, would and did produce an identification document which is transported in the mail in the course of its production, to wit, the defendants produced New York state DMV Identification Documents in stolen identities in exchange for a fee, in violation of Title 18, United States Code, Section 1028(a)(1).

Overt Acts

4. In furtherance of said conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about October 27, 2009, in New York, New York, WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/a "Mark Fowler," a/k/a "License Man," the defendant, met with a confidential informant to discuss obtaining DMV Identification Documents in a fraudulent identity.

b. On or about January 7, 2010, in Yonkers, New York, ROBIN JONES-WOODSON, the defendant, attempted to process a fraudulent DMV application submitted by one of DEWALT's customers.

c. On or about October 27, 2009, in New York, New York, GLENDA HINTON, the defendant, researched an identity in a DMV database at DEWALT's request to determine whether the DMV had already issued an identification document in that identity.

d. On or about October 27, 2009, in New York, New York, JOSE R. TORRES-MUNOZ, a/k/a "Paul," a/k/a "Roberto," a/k/a "Alberto," the defendant, transferred money to Puerto Rico.

e. On or about January 4, 2010, SARA DEL ROCIO CHERREZ-ROMERO, a/k/a "Olga Nieves Matos," the defendant,

translated a telephone call between DEWALT and TORRES-MUNOZ regarding documents in a fraudulent identity.

f. On or about January 4, 2010, MAX LNU, a/k/a "David Ray Craven," a/k/a "Julius Simons," the defendant, spoke by telephone with DEWALT about obtaining DMV identification documents in a fraudulent identity for a woman CRAVEN knew.

g. On or about January 7, 2010, DOUGLAS L. ROPER, a/k/a "Nicky Roper," a/k/a "Nicky Martinez," a/k/a "Nick," a/k/a "Nate," the defendant, had a telephone call with DEWALT in which he agreed to give DEWALT a Social Security card that day.

(Title 18, United States Code, Section 1028(a)(1) and (f).)

COUNT TWO

(Aggravated Identity Theft)

The Grand Jury further charges:

5. In or about January 2010, in the Southern District of New York and elsewhere, WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/a "Mark Fowler," a/k/a "License Man," JOSE R. TORRES-MUNOZ, a/k/a "Paul," a/k/a "Roberto," a/k/a "Alberto," and ROBIN JONES-WOODSON, the defendants, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, the identity fraud conspiracy charged in Count One, unlawfully, wilfully, and knowingly did transfer, possess, and use, without lawful

authority, a means of identification of another person, to wit, DEWALT, TORRES-MUNOZ, and JONES-WOODSON each possessed and used the name, date of birth, and Social Security number of another person in connection with the identity fraud conspiracy charged in Count One of this Indictment.

(Title 18, United States Code, Section 1028A(a)(1).)

COUNT THREE

(Conspiracy To Misuse A Social Security Number)

The Grand Jury further charges:

6. From in or about 2006, through in or about February 2010, in the Southern District of New York and elsewhere, WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/a "Mark Fowler," a/k/a "License Man," ROBIN JONES-WOODSON, GLENDA HINTON, JOSE R. TORRES-MUNOZ, a/k/a "Paul," a/k/a "Roberto," a/k/a "Alberto," SARA DEL ROCIO CHERREZ-ROMERO, a/k/a "Olga Nieves Matos," MAX LNU, a/k/a "David Ray Craven," a/k/a "Julius Simons," and DOUGLAS L. ROPER, a/k/a "Nicky Roper," a/k/a "Nicky Martinez," a/k/a "Nick," a/k/a "Nate," the defendants, and others known and unknown, unlawfully, wilfully, and knowingly combined, conspired, confederated, and agreed together and with each other to commit an offense against the United States, to wit, to violate Section 408(a)(7)(B) of Title 42, United States Code.

7. It was a part and an object of the conspiracy that WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/a "Mark Fowler," a/k/a "License Man," ROBIN JONES-WOODSON, GLENDA HINTON, JOSE R. TORRES-MUNOZ, a/k/a "Paul," a/k/a "Roberto," a/k/a "Alberto," SARA DEL ROCIO CHERREZ-ROMERO, a/k/a "Olga Nieves Matos," MAX LNU, a/k/a "David Ray Craven," a/k/a "Julius Simons," and DOUGLAS L. ROPER, a/k/a "Nicky Roper," a/k/a "Nicky Martinez," a/k/a "Nick," a/k/a "Nate," the defendants, and others known and unknown, unlawfully, wilfully, and knowingly, and with intent to deceive, would and did falsely represent a number to be the Social Security account number assigned by the Commissioner of Social Security to a person, when in fact such number was not the Social Security account number assigned by the Commissioner of Social Security to that person, to wit, the defendants helped customers for fraudulent identities use Social Security numbers assigned to other people to help those customers apply for New York State driver's licenses, learner's permits, and identification cards under other people's identities, in violation of Title 42, United States Code, Section 408(a)(7)(B).

Overt Acts

8. In furtherance of said conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about October 27, 2009, in New York, New York, WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/a "Mark Fowler," a/k/a "License Man," the defendant, met with a confidential informant to discuss obtaining DMV identification documents in a fraudulent identity.

b. On or about January 7, 2010, in Yonkers, New York, ROBIN JONES-WOODSON, the defendant, attempted to process a fraudulent DMV application submitted by one of DEWALT's customers.

c. On or about October 27, 2009, in New York, New York, GLENDA HINTON, the defendant, researched an identity in a DMV database at DEWALT's request to determine whether the DMV had already issued an identification document in that identity.

d. On or about October 27, 2009, in New York, New York, JOSE R. TORRES-MUNOZ, a/k/a "Paul," a/k/a "Roberto," a/k/a "Alberto," the defendant, transferred money to Puerto Rico.

e. On or about January 4, 2010, SARA DEL ROCIO CHERREZ-ROMERO, a/k/a "Olga Nieves Matos," the defendant, translated a telephone call between DEWALT and TORRES-MUNOZ regarding documents in a fraudulent identity.

f. On or about January 4, 2010, MAX LNU, a/k/a "David Ray Craven," a/k/a "Julius Simons," the defendant, spoke by telephone with DEWALT about obtaining DMV identification documents in a fraudulent identity for a woman CRAVEN knew.

g. On or about January 7, 2010, DOUGLAS L. ROPER, a/k/a "Nicky Roper," a/k/a "Nicky Martinez," a/k/a "Nick," a/k/a "Nate," the defendant, had a telephone call with DEWALT in which he agreed to give DEWALT a Social Security card that day.

(Title 18, United States Code, Section 371.)

COUNT FOUR

(Bribery)

The Grand Jury further charges:

9. From in or about 2006, through in or about February 2010, in the Southern District of New York and elsewhere, WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/a "Mark Fowler," a/k/a "License Man," the defendant, did unlawfully, wilfully, knowingly, and corruptly give, offer, and agree to give something of value to a person, with intent to influence or reward an agent of a state government and an agency thereof that received in a one-year period benefits in excess of \$10,000 under a federal program involving a grant, contract, subsidy, loan, guarantee, insurance, and other form of federal assistance, to wit, the New York DMV, in connection with a business, transaction, and series of transactions of such government and agency involving things of value of \$5,000 and more, to wit, DEWALT paid employees of the DMV to research identities in DMV databases to determine whether a driver's

license, learner's permit, or identification document had already been issued in a stolen identity and then to issue an identification document in that identity.

(Title 18, United States Code, Sections 666(a)(2) and 2.)

COUNT FIVE

(Accepting A Bribe)

The Grand Jury further charges:

10. From in or about 2006, through in or about February 2010, in the Southern District of New York, ROBIN JONES-WOODSON, the defendant, being an agent of a state government and an agency thereof that received in a one-year period benefits in excess of \$10,000 under a federal program involving a grant, contract, subsidy, loan, guarantee, insurance, and other form of federal assistance, to wit, the New York DMV, unlawfully, wilfully, knowingly, and corruptly did solicit and demand for the benefit of a person, and accept and agree to accept, a thing of value, intending to be influenced and rewarded in connection with a business, transaction, and series of transactions of such government and agency involving things of value of \$5,000 and more, to wit, JONES-WOODSON, while an employee of the DMV, accepted payments in exchange for issuing identification documents in stolen identities.

(Title 18, United States Code, Sections 666(a)(1)(B) and 2.)

COUNT SIX

(Accepting A Bribe)

The Grand Jury further charges:

11. From in or about 2006, through in or about February 2010, in the Southern District of New York, GLENDA HINTON, the defendant, being an agent of a state government and an agency thereof that received in a one-year period benefits in excess of \$10,000 under a federal program involving a grant, contract, subsidy, loan, guarantee, insurance, and other form of federal assistance, to wit, the New York DMV, unlawfully, wilfully, knowingly, and corruptly did solicit and demand for the benefit of a person, and accept and agree to accept, a thing of value, intending to be influenced and rewarded in connection with a business, transaction, and series of transactions of such government and agency involving things of value of \$5,000 and more, to wit, HINTON, while an employee of the DMV, accepted payments in exchange for researching identities in DMV databases to determine whether any identification documents had already been issued in that identity.

(Title 18, United States Code, Sections 666(a)(1)(B) and 2.)

COUNT SEVEN

(Misuse of a Social Security Number)

The Grand Jury further charges:

12. On or about July 14, 2009, in the Southern District of New York, SARA DEL ROCIO CHERREZ-ROMERO, a/k/a "Olga Nieves Matos," the defendant, unlawfully, wilfully, knowingly, and with intent to deceive, did falsely represent a number to be the Social Security account number assigned by the Commissioner of Social Security to her, when in fact such number was not the Social Security account number assigned by the Commissioner of Social Security to her, to wit, CHERREZ-ROMERO used a Social Security number assigned to another person to apply for a New York state driver's permit in that other person's identity.

(Title 42, United States Code, Section 408(a)(7)(B).)

COUNT EIGHT

(Misuse of a Social Security Number)

The Grand Jury further charges:

13. On or about January 5, 2010, in the Southern District of New York, MAX LNU, a/k/a "David Ray Craven," a/k/a "Julius Simons," the defendant, unlawfully, wilfully, knowingly, and with intent to deceive, did falsely represent a number to be the Social Security account number assigned by the Commissioner of Social Security to him, when in fact such number was not the

Social Security account number assigned by the Commissioner of Social Security to him, to wit, MAX LNU used a Social Security number assigned to another person to apply for a New York state driver's permit in that other person's identity.

(Title 42, United States Code, Section 408(a)(7)(B).)

FORFEITURE ALLEGATION

14. As a result of committing the offense alleged in Count One, WILCH DEWALT, a/k/a "Sharrieff Sabazz Muhammad," a/k/a "G," a/k/a "Mark Fowler," a/k/a "License Man," ROBIN JONES-WOODSON, GLENDA HINTON, JOSE R. TORRES-MUNOZ, a/k/a "Paul," a/k/a "Roberto," a/k/a "Alberto," SARA DEL ROCIO CHERREZ-ROMERO, a/k/a "Olga Nieves Matos," MAX LNU, a/k/a "David Ray Craven," a/k/a "Julius Simons," and DOUGLAS L. ROPER, a/k/a "Nicky Roper," a/k/a "Nicky Martinez," a/k/a "Nick," a/k/a "Nate," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offense, including but not limited to a sum in United States currency representing the amount of proceeds obtained as a result of the offense.

15. As a result of committing the offenses alleged in Counts Four, Five, and Six, WILCH DEWALT, a/k/a "Sharrieff Sabazz

Muhammad," a/k/a "G," a/k/a "Mark Fowler," a/k/a "License Man," ROBIN JONES-WOODSON, and GLENDA HINTON, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offenses, including but not limited to a sum in United States currency representing the amount of proceeds obtained as a result of the offenses.

Substitute Assets Provision

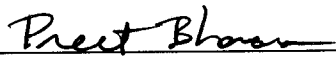
16. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value;
or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C.
§ 853(p), to seek forfeiture of any other property of said
defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981 and
Title 28, United States Code, Section 2461)


FOREPERSON


PREET BHARARA
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

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Defendants.


INDICTMENT

10 Cr.

(18 U.S.C. §§ 371, 1028(a)(1) & (f),
1028A(a)(1); & 42 U.S.C. § 408(a)(7)(B))

PREET BHARARA
United States Attorney.

A TRUE BILL


Foreperson.

3/23/10
SBI Case assigned to Judge Hellenstein
RJ Gonsky